

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X		
JASON CAMACHO AND ON BEHALF OF	:	
ALL OTHER PERSONS SIMILARLY	:	Civil Action No. 1:18-cv-10700-ER
SITUATED,	:	
	:	
Plaintiff,	:	
v.	:	
	:	
RIDER UNIVERSITY,	:	
	:	
Defendant.	:	
	:	
----- X		

**DECLARATION OF SUSAN C. CHRISTIAN**

I, Susan C. Christian, based on my personal knowledge and pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am over the age of eighteen (18) years old. I have personal knowledge of the facts contained in this declaration, and they are true and correct to the best of my knowledge, information and belief.
2. I hold the position of Dean of Enrollment at Rider University ("Rider").
3. Rider is a post-secondary institution of higher learning that is organized under the laws of the state of New Jersey, with its principal place of business located in Lawrenceville, New Jersey.
4. Rider does not maintain a campus or an office in New York.
5. Rider does not maintain any bank accounts in New York, and does not pay New York taxes.
6. Rider does not have a registered agent for service of process in New York.
7. Rider does not own any real property in New York.

8. Rider does not hold any physical classes or seminars in New York, and its only campuses are located in Princeton and Lawrenceville, New Jersey.

9. Rider does not target New York over other states where it recruits students. For example, Rider typically participates in approximately 950 college fairs and similar recruitment events each year in at least 12 states, including California, Connecticut, Florida, Massachusetts, Maryland, North Carolina, New Jersey, New York, Pennsylvania, Texas, Virginia, and the District of Columbia.

10. In 2018, Rider had 209 students who were New York residents, which constitutes 4 percent of the total student population.

11. None of Rider's faculty members or employees are New York residents.

12. Rider owns and operates the website, [www.rider.edu](http://www.rider.edu) (the "Website").

13. The Website was not created or maintained in New York. Further, there are no individuals working or residing in New York who can create, modify, or delete content on the Website.

14. The Website provides information about academic programs, campus news, admission, financial aid, and other similar topics.

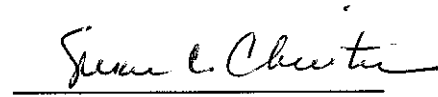
15. A Rider employee, David Powell, attended the student recruitment fair at the Jacob Javits Center in New York, New York on November 5, 2018 (the "Fair").

16. Rider's records indicate that Plaintiff Jason Camacho is not a student at Rider, and has not submitted an application for admission to Rider.

17. Rider does not have any record of Plaintiff requesting that any Rider representative provide any aid or assistance, with respect to the Website, or otherwise.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and accurate.

Executed on 6/14/19

A handwritten signature in cursive script, appearing to read "Susan C. Christian", written over a horizontal line.

Susan C. Christian